

What is the purpose of the briefing?

- Respond to questions about the Libby ROD.
- Explain delay of ROD and proposed plan date.
- Explain and discuss community involvement.
- Answer any other questions we can.



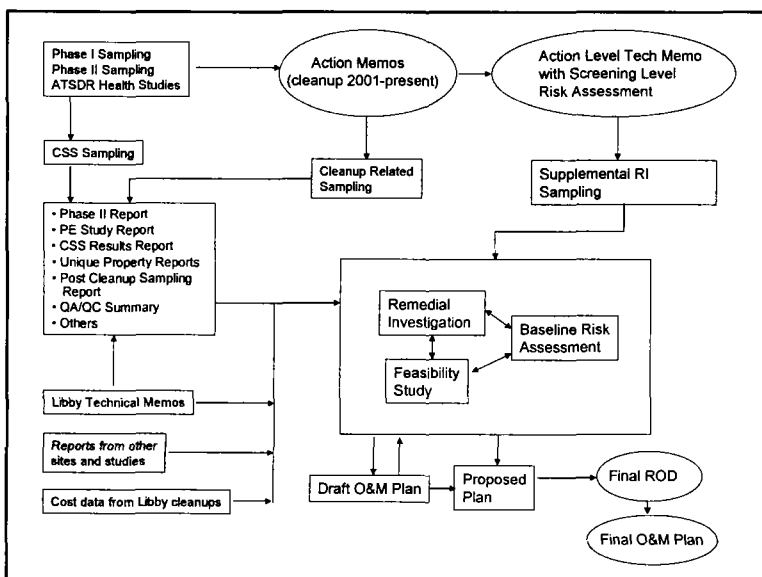
What is OU4 and how does it apply to the entire Libby Site?

- Operable Units (OUs) are discrete “sections” of Superfund sites that are managed somewhat independently.
- Currently there are seven OUs for the Libby Asbestos Site.
- OU4 is a “site-wide” OU, but it is geared toward the residential/commercial sections of the Libby area.
- **The OU4 ROD will establish “site-wide” standards for remedial action and provide details on residential/commercial cleanups. Other OUs are unique and may require additional RODs and different standards or approaches.**



Some Basic Terms

- Removal vs. Remedial Actions
- Remedial Investigation/Feasibility Study (RI/FS)
- Baseline Risk Assessment (BRA)
- Proposed Plan
- Record of Decision (ROD)
 - Interim, Contingency, “Final”
- Institutional Controls (ICs)
- Operations and Maintenance (O&M)



Why do a ROD in the first place?

- Need to transition from removal to remedial authority.
 - NCP
 - Degree and nature of risk
 - Legal concerns
 - More public involvement requirements and opportunities
 - Develop/implement long-term monitoring & O&M
 - Helps in developing exit strategy
 - BRA requirement which in turn impacts RI/FS and Proposed Plan



What kind of ROD is EPA pursuing for OU4?

- Originally indicated an Interim ROD...
- Why?
 - We can't get it all. Nearly any remedial action will result in some contamination remaining in place. We need ICs and O&M to manage this contamination. ICs and O&M are difficult to negotiate and set up.
 - We wanted to move quickly.
 - Two part approach (IROD, then "Final" ROD w/ICs and O&M).
- Now pursuing a "Final" ROD for OU4



Why the change?

- One ROD instead of two.
 - Less costly
 - Community involvement less protracted
- Legal concerns on use of IROD.
- More uncertainty



Why has the date been delayed?

- Most importantly, we want to get it right the first time.
- The technical, engineering, and legal issues are very complex and take time to resolve.
- The stakes are high. The BRA, RI/FS, proposed plan, and ROD will face intense scrutiny both on a local and national level.
- Resources are stretched. Criminal case, civil case, ongoing cleanup and other aspects require resources.
- "Final" ROD will require more time to address ICs and O&M.



What is our current plan?

BRA: Summer

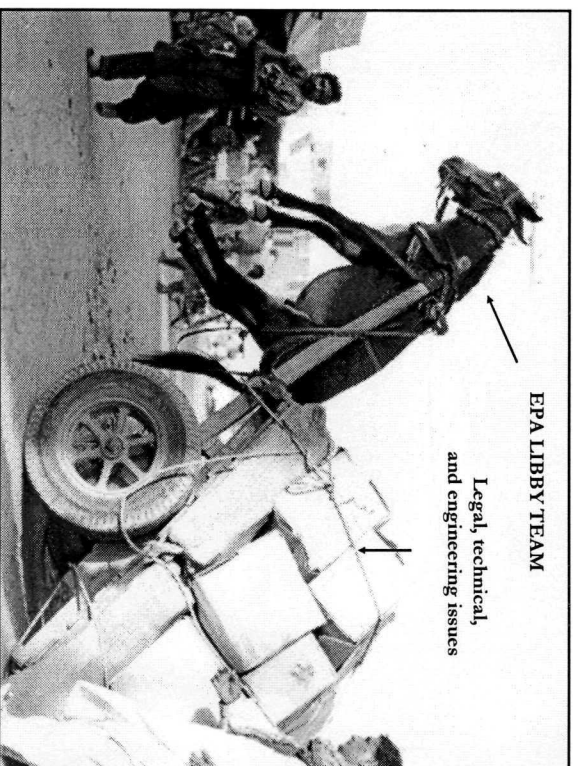
PD: DEC

Knowns

1. Community impact on BRA
2. Community ownership of cleanup plan

EPA LIBBY TEAM

Legal, technical,
and engineering issues



How will the change affect cleanup and community involvement?

- It won't.
- The public participation requirements for an IROD or ROD are the same.
- We know the only ROD and cleanup plan that will withstand challenge is one that the community has had ample chance to review, understand, and impact.
- ICs and O&M can't work without local and state buy-in and implementation.
- We intend to continue removal action cleanups at same pace. On schedule for 200+ cleanups again in 2006.

X
X
X



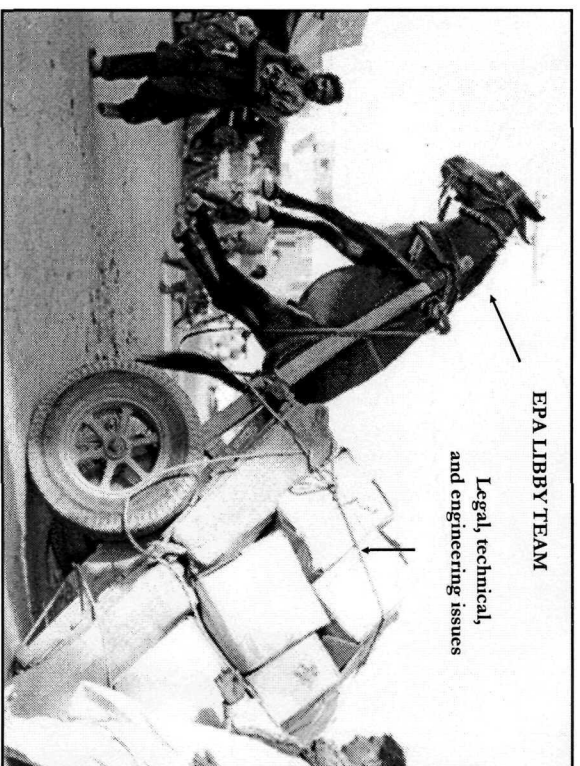
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What is our current plan?

- Add critical path/ milestones when decided upon.



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What is the plan for community involvement?

- Some is already in motion...
 - Newspaper columns
 - Public briefings
 - Funding TAG advisor
 - Documents to TAG and others (e.g. MDEQ) for review
 - Surveys (pre and post ROD)
 - Fact sheets
 - O&M Workgroup



What is the plan for community involvement?

- More is coming...
 - Review of technical documents leading up to BRA and RI/FS by TAG and other stakeholders. We seek balance.
 - Simplified, plain English documents.
 - O&M Plan
 - Proposed Plan
 - Comment Period
 - Public Meeting
 - ROD and responsiveness summary
 - Continued commitment to work with community on issues of concern. It doesn't end with the ROD.

Questions?